

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

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Carlanda D. Meadors, et al.,

Plaintiffs,

v.

Erie County Board of Elections,

Defendant,

AND

India Walton,

Defendant-Intervenor.

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Case No. 21-cv-982-JLS

The Hon. John L. Sinatra

**NOTICE OF MOTION AND MOTION FOR PRO HAC VICE ADMISSION OF  
JASON HARROW AS COUNSEL FOR  
DEFENDANT ERIE COUNTY BOARD OF ELECTIONS**

PLEASE TAKE NOTICE that upon the annexed affidavit of Jeremy Toth, Esq., and upon all documents required by Local Rule of Civil Procedure 83, the undersigned will move this Court at Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202, to grant Jason Harrow Admission Pro Hac Vice. Pursuant to the Procedures to Practice in the United States District Court, Western District of New York, Defendant Erie County Board of Elections requests that attorney Jason Harrow be granted leave to appear pro hac vice in this matter.

As grounds for this Motion, Defendant states:

1. Attorney Jason Harrow is a member in good standing of the bars of New York and California, as well as the federal courts listed in the included Petition for Attorney Admission.

2. Harrow is a partner at the law firm Gerstein Harrow LLP, and he has substantial experience litigating complex civil cases, including election law and other constitutional matters. He has previously served as an Assistant Solicitor General for the State of New York and has argued in courts including the U.S. Supreme Court, the New York Court of Appeals, and the Second Circuit.

3. Accompanying this motion is the following:

- a. Applicant's completed Petition for Admission to Practice
- b. Attorney's Oath
- c. Affidavit of Sponsor Jeremy Toth
- d. Civility Principles Oath
- e. Applicant's completed new attorney e-filing registration form.

Dated: March 25, 2022

Respectfully submitted,

/s/ JEREMY TOTH

Jeremy Toth

SECOND ASSISTANT COUNTY ATTORNEY, ERIE COUNTY

95 Franklin St., 16th Floor

Buffalo, NY 14202

(716) 858-2204

Jeremy.Toth@erie.gov

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

Print

IN THE MATTER OF THE APPLICATION OF

Jason Harrow

(Name)

TO BE ADMITTED TO PRACTICE AS AN ATTORNEY

TO THE HONORABLE John L. Sinatra, JUDGE OF THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK:

Jason Harrow

, petitioner herein, respectfully states:

1. That petitioner has an office for the practice of law at:

3243B S. La Cienega Blvd., Los Angeles, CA 90016

2. That petitioner attended the following educational institutions and received the following degrees:

Harvard Law School, J.D. 2011  
Princeton University, A.B. 2006

3. Please complete either (a), (b) or (c):

Admission by Petition

(a) That petitioner was admitted to practice by the Appellate Division of the Supreme Court, \_\_\_\_\_ Department of the State of New York on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Additional Requirements:

Admission Sponsoring Affidavit  
Attorney's Oath  
Civility Principles Oath  
Attorney Database Form  
Attorney CM/ECF Registration Form  
\*Include the Pro Bono Volunteer Panel Form if you wish to become a member of the Court's Volunteer Pro Bono Panel.

Admission by Certificate of Good Standing

(b) That petitioner was admitted to practice in the United States District Court of the \_\_\_\_\_ District of New York on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, and is a member of the bar of the State in which that district court is located and in which the petitioner maintains an office for the practice of law.

Additional Requirements:

Certificate of Good Standing from the Clerk of Court of which he or she is a member (dated no earlier than six months prior to submission to this Court)  
Check or money order in the amount of the Attorney Admission fee set forth in the District Court Schedule of Fees  
Attorney's Oath  
Civility Principles Oath  
Attorney Database Form  
Attorney CM/ECF Registration Form  
\*Include the Pro Bono Volunteer Panel Form if you wish to become a member of the Court's Volunteer Pro Bono Panel.

Pro Hac Vice Admission

(c) That petitioner is admitted to practice in the State of California

Additional Requirements:

Motion to Appear Pro Hac Vice  
Check, Money Order or payment of fee on line in the amount of the Pro Hac Fee set forth in the District Court Schedule of Fees  
Admission Petition Form  
Admission Sponsor Affidavit  
Attorney's Oath  
Civility Principles Oath  
Attorney Database Form  
Attorney CM/ECF Registration Form

4. Petitioner is admitted to the following courts:

New York, California, ND Cal, CD Cal, SD Tex., DDC, CA2, CA10, CA9, CA5, U.S. Supreme Court

5. Since such admission(s), petitioner has practiced in the following courts:

EDNY, D. Md., Pa. Superior Court

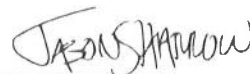
and has been involved in the following professional activities:

6. That petitioner or the petitioner's client (in a case in which the applicant represented the client) has never been held in contempt of court, sanctioned, censured in a disciplinary proceeding, suspended or disbarred by any court or admonished by any disciplinary committee of the organized bar, nor is the subject of any pending complaint before any court. (If number 6 is not true, the applicant shall strike that paragraph and shall file a separate confidential statement under seal specifying the court or disciplinary committee imposing the sanction, the date, the facts giving rise to the disciplinary action or complaint, the sanction imposed, and such other information, including any facts of a mitigating or exculpatory nature as may be pertinent, and such confidential statement, together with the petition, shall promptly be transmitted by the Clerk to the Chief Judge of the District for review.)

7. That petitioner has read and is familiar with the provisions of Title 28 of the United States Code that pertain to jurisdiction of and venue in a United States District Court, the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, the Local Rules of Practice for the United States District Court for the Western District of New York and the New York Rules of Professional Conduct (22 NYCRR Part 1200).

**WHEREFORE**, the petitioner respectfully requests to be admitted as an attorney in the United States District Court for the Western District of New York.

I verify under penalty of perjury that the foregoing is true and correct.



(Signature of Petitioner)

Sworn to before me this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

See attached form

Notary Public

## JURAT

State/Commonwealth of FLORIDA

☐ City ☒ County of Lehigh Acres Florida

On 03/23/2022, before me, Casey Perez,  
*Date* *Notary Name*

the foregoing instrument was subscribed and sworn (or affirmed) before me by:

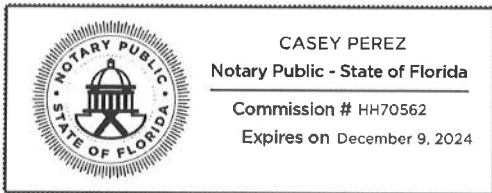
Jason Seth Harrow

*Name of Affiant(s)*

☐ Personally known to me -- OR --

☐ Proved to me on the basis of the oath of \_\_\_\_\_ -- OR --  
Name of Credible Witness

☒ Proved to me on the basis of satisfactory evidence: passport  
Type of ID Presented



WITNESS my hand and official seal.

Notary Public Signature: [Signature]

Notary Name: Casey Perez

Notary Commission Number: HH70562

Notary Commission Expires: 12/09/2024

*Notarized online using audio-video communication*

**DESCRIPTION OF ATTACHED DOCUMENT**

Title or Type of Document: Application Including oath/affirmation

Document Date: 03/23/2022

Number of Pages (including notarial certificate): 4

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

**ATTORNEY'S OATH**

STATE OF Arizona )  
 ) SS:  
Maricopa COUNTY )

I, Jason Harrow of Scottsdale, Arizona \_\_\_\_\_  
City, State

do solemnly swear or affirm that I will demean myself, as an attorney and counselor of the United States District Court for the Western District of New York, uprightly and accordingly to law; and I will support the Constitution of the United States. So help me God.



\_\_\_\_\_  
Signature of Attorney

Subscribed and sworn to before me this \_\_\_\_\_  
day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
See attached form

Notary Public

## JURAT

State/Commonwealth of FLORIDA

☐ City ☒ County of Lehigh Acres Florida

On 03/23/2022, before me, Casey Perez  
*Date* *Notary Name*

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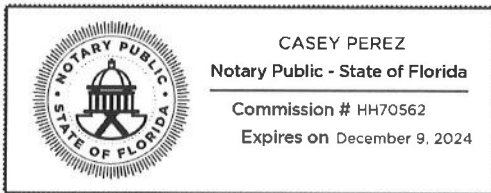
Jason Seth Harrow

*Name of Affiant(s)*

☐ Personally known to me -- OR --

☐ Proved to me on the basis of the oath of \_\_\_\_\_ -- OR --  
Name of Credible Witness

☒ Proved to me on the basis of satisfactory evidence: passport  
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Notary Name: Casey Perez

Notary Commission Number: HH70562

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

IN THE MATTER OF THE APPLICATION OF

**Jason Harrow**

(Name)

TO BE ADMITTED TO PRACTICE AS AN ATTORNEY

SPONSORING  
AFFIDAVIT

STATE OF NEW YORK )  
COUNTY OF **Erie** ) ss:

**Jeremy C. Toth**

, being duly sworn deposes and says:

1. I reside at:

**72 Ashland Avenue, Buffalo, New York 14222**

and maintain an office for the practice of law at: **95 Franklin Street, Room 1634, Buffalo, New York 14202**

2. I am an attorney at law, admitted to practice in the **Eighth Judicial District of New York**

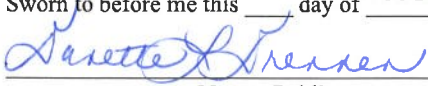
, I was admitted to practice in the United States District Court for the  
Western District of New York on the **11th** day of **May**, **2012**

3. I have known the petitioner since **2021** and under the following  
circumstances:

**co-counsel in Second Circuit appeal**

4. I know the following about the petitioner's moral character and fitness to be admitted to practice in this Court:

**He provided timely advice and excellent work product,**  
**and has practiced with integrity**

Sworn to before me this **28th** day of **March**, **2022**  
  
Notary Public

  
Signature of Sponsoring Attorney

DANETTE L. DRENNEN  
Notary Public, State of New York  
Qualified in Erie County  
My Commission Expires **2/14/23**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

**APPENDIX TO CIVILITY PRINCIPLES**

**OATH OF OFFICE**

I do solemnly swear (or affirm):

I will support the Constitution of the United States and the Constitution of the State of New York; I will maintain the respect due to Courts of Justice and judicial officers;

I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust nor any defense that I do not believe to be honestly debatable under the law of the land;

In maintaining the causes confided to me, I will employ only means that are honorable, and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidences and preserve inviolate the secrets of my client, and will accept compensation solely from the client or a third-party with the knowledge and approval of the client;

I will abstain from all offensive behavior and advance no fact prejudicial to the honor and reputation of a party or witness, unless my ethical duty requires;

I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed upon members of the bar who practice law in this State and before this Court.

A handwritten signature in dark ink, appearing to be "J. B. [unclear]", is written above a horizontal line.

(Signature)

# UNITED STATES DISTRICT COURT

## Western District of New York

### ATTORNEY DATABASE & ELECTRONIC CASE FILING REGISTRATION FORM

The Clerk's Office maintains a computerized database of attorneys admitted in the District. To ensure the data we enter for you is correct, please fill out the form below and submit it with your other papers when you are admitted. Our local rules require you to report name, firm affiliation, office address or phone number changes within 30 days.

This form shall also be used to register for an account on the Courts' Case Management/Electronic Files (CM/ECF) system. Registered attorneys will have privileges to electronically submit and to view the electronic docket sheets and documents. By registering, attorneys consent to receiving electronic notice of filings through the system. The following information is required for registration:

Instructions: PLEASE TYPE OR PRINT. If you use two surnames or have a hyphenated surname, please indicate how you would like the name entered into our records, i.e., first surname as middle name, both surnames in last name field, etc.

First Name:	Jason		
Middle Name or Initial:	S		
Last Name:	Harrow		
Firm Name:	Gerstein Harrow LLP		
Firm Address:	810 7th St. NE		
Suite:	Suite 301		
City:	Washington	State:	DC Zip: 20002 -
Phone Number:	323-744-5293	FAX Number:	- -
Primary E-Mail Address:	Jason@gerstein-harrow.com		
Additional E-Mail Address:	jason.harrow@gmail.com		
Does your E-Mail Software support HTML messages?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

Attorneys seeking to file documents electronically must be admitted to practice in the United States District Court for the Western District of New York.

Method of Admission: **Pro Hac Vice**  
(Petition, Certificate of Good Standing, *pro hac vice*)

Date admitted to practice in this Court: **Pending**  
(write "pending" if admission is pending)

If admitted pro hac vice:  
Date motion for pro hac vice granted: \_\_\_\_\_ in case number: **21-cv-982**

By submitting this registration form, the undersigned agrees to abide by all Court rules, orders and policies and procedures governing the use of the electronic filing system. The undersigned also consents to receiving notice of filings pursuant to Fed. R. Civ. P. 5(b) and 77(d) via the Court's electronic filing system. The combination of user id and password will serve as the signature of the attorney filing the documents.

Attorneys must protect the security of their passwords and immediately notify the court if they learn that their password has been compromised.



Signature of Registrant

March 25, 2022

Date

Please note that this form is required to be completed by any new attorneys seeking to be admitted to this District. If you have been previously admitted to practice in this court and are submitting this registration to request an account, you may fax the form to (716) 551-1705, or mail it to the following address:

Mary C. Loewenguth  
United States District Court  
Attn: CM/ECF Registration  
2 Niagara Square  
Buffalo, New York 14202

**\*OPTIONAL:** Your login and password will be sent to you by the Office of the Clerk via the e-mail address you provided on your registration form. **If you prefer to have your login and password sent by U.S. Mail, please write the address below and mark your initials as approval for an alternate delivery method:**

Firm Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Attorney Initials: \_\_\_\_\_